

RECEIVED FEDERAL ELECTION COMMISSION SECRETARIAT
RECEIVED FEDERAL ELECTION COMMISSION OFFICE OF GENERAL COUNSEL

June 5, 1996

JUN 10 4 21 PM '96
JUN 7 2 55 PM '96



Brad Litchfield
Associate General Counsel of Policy
Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463

Re: Advisory Opinion Request No. 96-23

Supplement
AOR 1996-23

Dear Mr. Litchfield:

The ITT Hartford Advocates Fund, the separate segregated fund connected with ITT Hartford Group, Inc. ("ITT Hartford"), concurs with the information and analysis submitted by Wiley, Rein & Fielding on behalf of ITT Corporation concerning the events surrounding the break up of the former ITT Corporation and the contention that the three separate segregated funds of the now independently managed and publicly traded entities should be deemed "unaffiliated" under Federal regulations.

Additionally, in connection with your review of the above Advisory Opinion Request, we would like to bring the following event to the Commission's attention:

- On May 16, 1996, at the Annual Shareholder's Meeting for ITT Hartford, the shareholders elected the slate of nominees for the Board of Directors, including the nomination of a new director, H. Patrick Swaggert, who has no present or previous affiliation with ITT Corporation or its affiliates.

The ITT Hartford Board now consists of eleven individuals, only four of whom are also on the Board of the New ITT, thus leaving seven members of the ITT Hartford Board who were and are not on the Board of the former ITT Corporation (See Exhibit A for Board membership). Further, the election of the slate of nominees for the Board by the ITT Hartford shareholders indicates that the Board has received specific shareholder approval and is not dictated by the Company's former sole shareholder, ITT Corporation.

Please feel free to contact me at (860) 547-5480 if you require further information.

Respectfully Submitted,


Joel Freedman
President

Attachment



ITT HARTFORD

Exhibit A

ITT Hartford Group, Inc. Board of Directors

1995 ITT Hartford Board Members (14)

Ramani Ayer
Rand V. Araskog
Donald R. Frahm
Arthur A. Hartman
Paul G. Kirk, Jr.
Abraham A. Ribicoff
Lowndes A. Smith
DeRoy C. Thomas
Gordon I. Ulmer
D. Travis Engen
Robert A. Burnett
Robert A. Bowman
Joseph H. Gareau
Bette B. Anderson

1996 ITT Hartford Board Members (11)

Bette B. Anderson
Rand V. Araskog
Ramani Ayer
Robert A. Burnett
Donald R. Frahm
Arthur A. Hartman
Paul G. Kirk, Jr.
Lowndes A. Smith
H. Patrick Swaggert
DeRoy C. Thomas
Gordon I. Ulmer

dr\ittboard.exh